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Arizona Corporation Commission

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MAY 7 2013



Arizona Corporation Commission
Docket Control
1200 W Washington Street
Phoenix, AZ 85007



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Docket E-01345A-13-0069 Opt-out Schedule

Dear Commissioners:

As a member of Safer Utilities Network and a resident of Snowflake, I want to address the opt-out proposal submitted to the Commission on March 22, 2013.

While I am very gratified that our voices have been heard and APS is submitting an opt-out plan, there are some very serious issues that need to be remedied before the plan is adopted.

Health Concerns

APS states that the health concerns related to smart meters "have proven unfounded." On the contrary, the health concerns which have been expressed by Arizona's EHS population and by various members of the general public are legitimate. Previous filings to Docket E-00000C-11-0328 by Safer Utilities Network and other concerned parties have addressed these concerns in detail and so I need not reiterate them in this letter. The main point I wish to make here is that APS must accommodate people on a limited income. APS' Schedule 17 proposal, Section 412, does not allow for any service fee discounts to people on a limited income. This policy places an unfair burden on some of the utility's most vulnerable customers. The monthly fee of \$30 is unreasonably high, based as it is on mandatory monthly on-site readings. The company should be willing to have quarterly readings which would greatly reduce the monthly fee.

The APS plan should provide discounts for adjacent meters. People who live in apartments, duplexes or on small city lots may need an adjacent neighbor to opt-out as well. In such an arrangement, the full cost of the neighbor's opt-out is likely to be carried by the same person, who may be disabled and on reduced income. As the extra cost of reading an additional meter in the same location is very small, it is reasonable that a very substantial discount be made available for such a situation.

I also wish to note that it is unreasonable to charge a full up-front fee when an existing analog meter is left in place since there is no need to refurbish an old meter and then send a technician to the site to install it.

Moreover, the opt-out should not be limited to wireless meters. APS' Schedule 17 Definitions (1.1 and 1.4) only cover wireless meters. According to these definitions, meters using PLC communications could qualify as a "non-automated meter."

As several earlier filings to Docket E-00000C-11-0328 have indicated, PLC meters have similar health and privacy issues as wireless meters. PLC is therefore not an acceptable substitute for wireless. While APS does not currently use PLC technology, it may do so in the future and so the Definitions cited above must be modified to prevent future difficulties from arising.

Sincerely,

David E. Smith

A handwritten signature in black ink, appearing to read "David E. Smith", with a stylized flourish at the end.